

ACKERMAN, LEVINE, CULLEN, BRICKMAN & LIMMER, LLP

Attorneys At Law
1010 Northern Boulevard
Suite 400
Great Neck, New York 11021
(516) 829-6900
(212) 466-6977
fax (516) 829-6966
www.ackermanlevine.com

VIA ECF

May 11, 2016

M. Judge Arlene R. Lindsey
U.S. District Court – EDNY
100 Federal Plaza
Central Islip, New York 11722

Re: Tatiana Herdocia et al v. Southern Wine & Spirits of America, Inc. et al
Case No. 14-CV-3196 (DRH)(ARL)
Joint Status Report and Proposed Scheduling Order

Dear Judge Lindsey:

Please be reminded that the undersigned represent the Plaintiffs in the above-referenced matter. Per the Court's order, dated May 3, 2016, all parties have conferred regarding outstanding discovery. At this time, Plaintiffs still need to depose defense witnesses. In addition, Plaintiffs intend on serving additional interrogatories and documents requests.

The parties respectfully request an extension of the discovery deadline up to and including *August 9, 2016*. In addition, if any party wishes to file a dispositive motion, a pre-motion conference letter would be due on or before *September 8, 2016*. Thank you for considering our request.

Respectfully submitted,

Jose G. Santiago

Jose G. Santiago, Esq.

cc: All parties via ECF.